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February 14C, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Application by Qwest Communications International
Inc. for Authority to Provide In-Region InterLATA
Services in New Mexico, Oregon and South Dakota;
WC Docket No. 03-11**

Dear Ms. Dortch:

Yesterday, representatives of Qwest met with FCC staff to discuss the comments filed last week in the above-referenced proceeding on Qwest's Operations Support Systems ("OSS"). Andrew Crain, Christopher Viveros and I, along with Yaron Dori of Hogan & Hartson, attended the meeting on behalf of Qwest; and Dan Poole, Nancy Lubamersky, Lynn Notarianni and Loretta Huff, all of Qwest, and Linda Oliver of Hogan & Hartson, participated via conference call. Commission staff in attendance included Gail Cohen, Lloyd Collier, Kimberly Cook, William Dever and Jeff Tignor.

At the meeting, we reviewed the issues raised by WorldCom regarding Qwest's EDI Development and provided preliminary responses to those issues. We discussed the assistance and documentation that Qwest makes available to CLECs to develop their EDI interfaces, and identified the evidence already in the record to support a finding of Section 271 compliance in this area, including the fact that Qwest's documentation was approved during the Third Party Test and that 31 CLECs have successfully used Qwest's documentation on a commercial basis to develop their EDI interfaces.

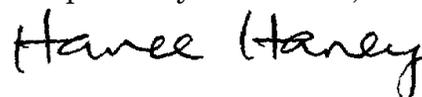
We also explained why the rejects WorldCom may have experienced when submitting certain orders were not the product of inadequate documentation or OSS. With respect to WorldCom's feature identification claim, we noted that other CLECs did not interpret Qwest's

documentation in this manner, and that, in any event, Qwest has committed to modify its documentation to address WorldCom's concern. With respect to WorldCom's "forward to" number claim, we noted that Qwest's systems work as designed and documented, but that this issue was nevertheless subject to discussion at a Change Management conference call and would likely be resolved shortly. We also indicated that WorldCom's concern regarding back-end tables for USOCs in Oregon has been resolved. With respect to WorldCom's concern about PREMIS, we reiterated that, because of the manner in which PREMIS was designed, Qwest specifically recommends to CLECs that they perform the address validation function by address and not by telephone number. We stated that all of these explanations will be included in detail in our reply comments. We also confirmed that the next version of Qwest's EDI software, which is scheduled for release on April 7, 2003, is expected to include features such as Migrate-as-Specified and Migrate-by-Telephone Number.

Finally, we discussed the claim raised by AT&T regarding the omission of a loop qualification provision in Qwest's SGAT in Oregon. We explained the reason for this omission, noted that the service in question is nevertheless available to CLECs in each of Qwest's 14 in-region states, and confirmed that Qwest plans to add this provision to the Oregon SGAT shortly.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,



Hance Haney

cc: K. Cook
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